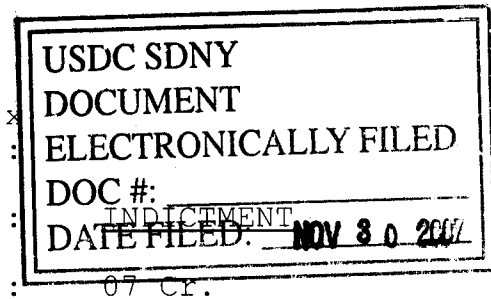


Judge McMahon

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

- v. -

EFRAIN CARRASQUILLO,
a/k/a "Fox,"
a/k/a "Bori,"
MICHAEL ORTIZ,
JUAN DE JESUS,
a/k/a "Willy," and
CHRISTIAN VERA,

Defendants.

07 CRIM 1076

COUNT ONE

The Grand Jury charges:

1. From in or about September 2006, up to and including on or about September 28, 2007, in the Southern District of New York and elsewhere, EFRAIN CARRASQUILLO, a/k/a "Fox," a/k/a "Bori," MICHAEL ORTIZ, JUAN DE JESUS, a/k/a "Willy," and CHRISTIAN VERA, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, CARRASQUILLO, ORTIZ, DE JESUS, and VERA, conspired to commit an armed robbery of an employee of the Wink Payment Center who

delivered cash to its various locations, including one at 29 East Bedford Park Boulevard, Bronx, New York.

OVERT ACTS

2. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about September 28, 2007, EFRAIN CARRASQUILLO, a/k/a "Fox," a/k/a "Bori," traveled to the vicinity of the Wink Payment Center at Villa Avenue and East Bedford Park Boulevard, Bronx, New York, armed with loaded firearms, and waited outside the Wink Payment Center for the courier, who was the target of the robbery, to arrive.

b. On or about September 28, 2007, MICHAEL ORTIZ, the defendant, traveled in a car containing loaded firearms to the vicinity of the Wink Payment Center at Villa Avenue and East Bedford Park Boulevard, Bronx, New York, and waited outside the Wink Payment Center for the courier, who was the target of the robbery, to arrive.

c. On or about September 28, 2007, JUAN DE JESUS, a/k/a "Willy," the defendant, traveled in a car containing loaded firearms to the vicinity of the Wink Payment Center at Villa Avenue and East Bedford Park Boulevard, Bronx, New York, and and waited outside the Wink Payment Center for the courier,

who was the target of the robbery, to arrive.

d. On or about September 28, 2007, CHRISTIAN VERA, the defendant, drove a car containing loaded firearms to the vicinity of the Wink Payment Center at Villa Avenue and East Bedford Park Boulevard, Bronx, New York, and waited outside the Wink Payment Center for the courier, who was the target of the robbery, to arrive.

(Title 18, United States Code, Section 1951(a).)

COUNT TWO

The Grand Jury further charges:

3. In or about September 2007, in the Southern District of New York, EFRAIN CARRASQUILLO, a/k/a "Fox," a/k/a "Bori," MICHAEL ORTIZ, JUAN DE JESUS, a/k/a "Willy," and CHRISTIAN VERA, the defendants, unlawfully, willfully and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the offense charged in Count One of this Indictment, did use and carry firearms, and, in furtherance of such crime, did possess firearms, to wit, a loaded .22 caliber Burgo revolver bearing serial number 147201, and a loaded Glock .45 caliber semi-automatic pistol bearing serial number HCM248, which the defendants used, carried and possessed in the vicinity of 29 East Bedford Park Boulevard, Bronx, New York.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT THREE

The Grand Jury further charges:

4. On or about September 27, 2007, in the Southern District of New York, EFRAIN CARRASQUILLO, a/k/a "Fox," a/k/a "Bori," the defendant, unlawfully, willfully and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, less than 100 grams of mixtures and substances containing a detectable amount of heroin, in violation of Sections 812, 841(a)(1), and 841(b)(1)(C).

(Title 21, United States Code,
Sections 812, 841(a), and 841(b)(1)(C).)

COUNT FOUR

The Grand Jury further charges:

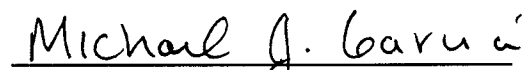
5. On or about September 27, 2007, in the Southern District of New York, EFRAIN CARRASQUILLO, a/k/a "Fox," a/k/a "Bori," the defendant, unlawfully, willfully and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the offense charged in Count Three of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm,

to wit, a loaded Raven Arms .25 caliber semiautomatic pistol bearing serial number 650490, along with a magazine, six (6) .25 caliber rounds and two (2) .45 caliber rounds.

(Title 18, United States Code,
Sections 924(c)(1)(A)(i), 924(c)(1)(C)(i), and 2.)

DEPUTY


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

EFRAIN CARRASQUILLO, a/k/a "Fox," a/k/a "Bori,"
MICHAEL ORTIZ, JUAN DE JESUS, a/k/a "Willy,"
and CHRISTIAN VERA,


Defendants.

INDICTMENT

07 Cr. ____

(Title 18, United States Code,
1951, 924(c), and 2;
Title 21, United States Code, 841(b)(1)(C))

Michael J. Garcia
United States Attorney.



DEPUTY FOREPERSON

Case Assigned to J McMahon

M J Gonsky

11/30/07